

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Richard Crosby (a/k/a "Richard Williams")

Case No. 1:23-mj-858

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of various dates in 2021-2023 in the county of (various) in the Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 USC 1343

42 USC 408(a)(7)(B)

18 USC 1028A

wire fraud

Social Security number fraud

aggravated identity theft

This criminal complaint is based on these facts:

(see affidavit)

☒ Continued on the attached sheet.

Frederick Reier

Complainant's signature

Special Agent Frederick Reier

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/24/2023

City and state: Cincinnati, Ohio

Karen L. Litkovitz

United States Magistrate Judge



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES

v.

RICHARD CROSBY (a/k/a “Richard
Williams”)

Case No. 1:23-mj-858

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Frederick Reier, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Office of Inspector General, Social Security Administration. I am currently assigned to the Cincinnati Resident Office, Office of Investigations. In this capacity, I investigate fraud in Social Security programs including identity theft, misuse of a social security number, Social Security employee misconduct, and Social Security benefits fraud. Since 2016, I have received training and investigative experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, electronic media and computer investigations, and various other crimes and investigative techniques including Title III investigations.

2. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon my interview of various witnesses and review of various records and publicly available information, or has been relayed to me by other agents or sworn law enforcement personnel. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint and arrest warrant, I have not

included each and every fact known to me concerning the investigation. I have set forth only those facts that I believe are necessary to establish probable cause to support the requested complaint and arrest warrant.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1343 (Wire Fraud), 42 U.S.C. § 408(a)(7)(B) (False Representation of a Social Security Number), and 18 U.S.C. § 1028A (Aggravated Identity Theft) have been committed by RICHARD CROSBY (a/k/a Richard Williams).

PROBABLE CAUSE

4. This matter concerns fraud, identity theft and social security number misuse allegedly perpetrated by RICHARD CROSBY, SSN xxx-xx-5973, a/k/a Richard Williams (hereafter “CROSBY”) in the Southern District of Ohio. There is probable cause to believe that CROSBY, a former lawyer, used a false name and social security number, and made materially false statements over the internet in order to obtain employment as an attorney with several law firms.

CROSBY’S Disbarment and Prosecution in Hamilton County

5. On November 6, 2020, the Cincinnati Bar Association filed a complaint against CROSBY with the Board of Professional Conduct of the Supreme Court of Ohio (case 20-065). The complaint alleged that CROSBY—who was then a licensed attorney—violated numerous rules of professional conduct. On April 22, 2021, the Board of Professional Conduct entered an order staying the disciplinary proceedings because CROSBY had indicated his intent to resign from the practice of law.

6. On June 24, 2021, CROSBY was indicted and charged in Hamilton County with

Felony Theft and Unauthorized Use of Property (case B 2103088). The charges alleged that CROSBY stole client funds while acting in his capacity as an attorney.

7. On September 27, 2021, the Ohio Supreme Court issued an order accepting CROSBY's resignation from the practice of law with disciplinary action pending.

8. On November 8, 2021, CROSBY was indicted and charged in Hamilton County with theft and telecommunications fraud (case B 2105212).

9. On December 15, 2021, the United States District Court for the Southern District of Ohio entered an order disbaring CROSBY from practicing in that court (case 2:21-mc-00036-ALM).

10. On May 5, 2022, CROSBY was arrested in connection with both of his pending Hamilton County criminal indictments. He pled guilty in both cases on May 26, 2023. On June 27, 2023, he was sentenced to probation in both cases.

CROSBY's Identity Fraud to Obtain Employment with "Law Firm #1"

11. According to records from Google, the account richardcwilliamsesq@gmail.com was established on April 26, 2021—just four days after CROSBY indicated his intent to resign from the practice of law under pending disciplinary action, as discussed above. While the customer information profile for this email account lists Richard Williams as the account holder, the billing information lists RICHARD CROSBY. The records also show multiple logins from Internet Protocol (IP) addresses located on servers in the Southern District of Ohio.

12. On or about June 1, 2021, CROSBY (using the alias "Richard Williams") used the email address richardcwilliamsesq@gmail.com to communicate with attorneys at "Law Firm #1," a law firm in Washington, D.C. In these emails, CROSBY (a/k/a Richard Williams) sought

employment with the firm.

13. I have spoken with a partner at Law Firm #1, who explained that the firm briefly employed CROSBY (posing as Richard Williams) in June 2021. The partner at Law Firm #1 provided me with a photo of “Richard Williams.” This photo depicts CROSBY.



“Richard Williams” photo from Law Firm #1



*RICHARD CROSBY photo from
Ohio Bureau of Motor Vehicles*

14. The partner also provided me with a resume that CROSBY (as “Williams”) gave to the firm. The resume lists an address in North Carolina and lists the email address for “Williams” as RichardCWilliamsEsq@gmail.com.

15. The partner also provided me with a direct deposit form that CROSBY (as “Williams”) completed. On this form, he asked for his pay to be deposited into an account at PNC Bank held by an entity called CM Alliance. According to records from the Ohio Secretary of State, CM Alliance Limited was organized on July 31, 2020 by RICHARD CROSBY. According to records from PNC Bank, the bank account was opened on March 9, 2021 by RICHARD CROSBY.

CROSBY’s Identity Fraud to Obtain Employment with “Law Firm #2”

16. On or around September 22, 2022—at which point CROSBY had been disbarred in

Ohio and arrested on the Hamilton County charges—CROSBY applied for an attorney position under the alias of “Richard Williams” with “Law Firm #2,” a legal firm based in Miami, Florida. CROSBY met with a recruiter via Zoom, a video telecommunication service, on at least one occasion and the recruiter saw his face. During the meeting, CROSBY represented himself as Richard Williams, a licensed attorney admitted to the bar in New York and the District of Columbia. CROSBY again confirmed this information to the recruiter in an email originating from richardcwilliamsesq@gmail.com on October 12, 2022.

17. The recruiter ultimately referred CROSBY for interviews with the hiring manager for the position with Law Firm #2. In October of 2022, the hiring manager conducted interviews with CROSBY (whom he knew as Richard Williams) over Zoom. The hiring manager met with CROSBY over Zoom between October 5, 2022, and October 8, 2022. The hiring manager also met with CROSBY in person between October 19 and October 20, 2022, in Florida. During these interactions, CROSBY represented himself as a licensed attorney named Richard Williams who was admitted to the bar in New York and the District of Columbia. CROSBY stated that he currently resided in the District of Columbia but was planning to move to Florida. Law Firm #2 ultimately hired CROSBY and extended an offer of employment as an attorney on October 13, 2022. His starting salary was \$185,000 per year, plus a \$5,000 signing bonus.

18. On October 17, 2022, CROSBY accepted the offer and was referred to Law Firm #2’s Financial Controller/Human Resource Officer. The Human Resource Officer sent an email to richardcwilliamsesq@gmail.com asking CROSBY, whom he knew as Richard Williams, to fill out onboarding documents including a U.S. Citizenship and Immigration Services Form I-9, Direct Deposit Form, and IRS Form W-4. CROSBY returned the documents via email from

richardcwilliamsesq@gmail.com.

19. The Form I-9 attached to the email lists CROSBY's name as Richard Williams with social security number xxx-xx-9414, and his email as richardcwilliamsesq@gmail.com. The IRS Form W-4 lists CROSBY's name as Richard C. Williams with social security number xxx-xx-9414. It also lists an address for "Williams" in Washington, D.C. The direct deposit form lists an account at PNC Bank and a woman's name. I have spoken with the woman, and she confirmed that she was previously romantically involved with RICHARD CROSBY.

20. I showed both the recruiter and the hiring manager a photo from CROSBY's Ohio Driver's License record. They both confirmed that CROSBY is the person they met with and that he presented himself as Richard Williams. Further, the hiring manager confirmed that had he been aware of CROSBY's true identity and that CROSBY was not admitted to the New York or District of Columbia bar, he would not have hired him.

21. Social Security Administration records show that CROSBY's social security number is xxx-xx-5973 and that his name is RICHARD CROSBY. The social security number xxx-xx-9414 (which CROSBY used at Law Firm #2) belongs to the above-referenced woman with whom CROSBY was previously romantically involved. When I spoke with her, she confirmed that she did not give CROSBY permission to use her Social Security number. Her Social Security wage records show wages from Law Firm #2 because CROSBY used her Social Security number to work there, while CROSBY's Social Security wage records show no income from Law Firm #2.

22. On the I-9 form, CROSBY also listed the woman's passport number as the passport number for "Richard Williams."

23. The New York Office of Court Administration told me that they have no record

of an attorney with the name Richard Crosby.

24. A search of the District of Columbia Bar Member Directory revealed no attorney with the name Richard Crosby.

25. In April 2023, Law Firm #2 received an inquiry from an investigator with the Clermont County, Ohio, Child Support Enforcement office and thus Law Firm #2 was made aware of CROSBY's true identity and fired him. Between October 2022 and March 2023, Law Firm #2 paid CROSBY approximately \$83,269.29 in salary to which he was not entitled. Additionally, Law Firm #2 paid the recruiter approximately \$50,000 to recruit CROSBY.

CROSBY's Identity Fraud to Obtain Employment with "Law Firm #3"

26. In July 2023—at which point CROSBY had been disbarred in Ohio and sentenced on the Hamilton County charges—CROSBY, under the alias of Richard Williams, attempted to obtain employment with "Law Firm #3," which is based in Coral Gables, Florida. I have spoken with the Chief Operating Officer of the firm, who explained that CROSBY responded to a job posting and was interviewed over Zoom on or about July 22, 2023. CROSBY was then interviewed by senior management of the firm on or about July 24, 2023, over Zoom. In interviews, CROSBY presented himself as Richard Williams, an attorney licensed to practice law in the District of Columbia and New York.

27. During the hiring process, CROSBY used the email richardwilliamsesq@gmail.com to communicate with the firm. On July 26, 2023, CROSBY sent an email attached with a document that purported to be a screen shot of the name "Richard Coleman Williams Jr." in the online DC Bar membership directory.

28. I conducted a search of the DC Bar membership directory for "Richard Coleman

Williams Jr.” and no result came up. However, I conducted a search for Richard Coleman and a membership listing appeared.

29. I compared the purported screen shot that CROSBY sent to the law firm with the actual screen shot of the listing for Richard Coleman from the DC Bar online directory and determined that CROSBY altered or fabricated the screen shot to add the last name “Williams” and then sent it to the law firm. Additionally, CROSBY provided a biography to the law firm. The document claims that “Williams” is admitted to the bar in the District of Columbia and New York. As explained above, this is false.

30. The firm offered “Williams” a starting salary of \$195,000 per year, plus a \$10,000 signing bonus.

31. The Chief Operating Officer of Law Firm #3 explained to me that the firm eventually determined that CROSBY was using a false identity and therefore did not hire him.

CONCLUSION

32. Based on the forgoing, I request that the Court issue the proposed complaint and arrest warrant.

REQUEST FOR SEALING

33. I further request that the Court order that all papers associated with this criminal complaint, including this affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give targets an opportunity to flee/continue flight from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise

seriously jeopardize the investigation.

Respectfully submitted,

Frederick Reier

Frederick Reier
Special Agent
Office of Inspector General
Social Security Administration

Subscribed and sworn to before me on October 24, 2023.

Karen L. Litkovitz

Karen L. Litkovitz
United States Magistrate Judge

The seal of the United States District Court for the Southern District of Ohio is visible in the background. It features an eagle with spread wings, perched on a shield with vertical stripes. The text "UNITED STATES DISTRICT COURT" is at the top and "SOUTHERN DISTRICT OF OHIO" is at the bottom of the circular seal.